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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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	:	
Moises Mendez,	:	
	:	
Plaintiff,	:	08 Civ. 4967 (CM)(KNF)
	:	
-against-	:	DEFENDANT'S PROPOSED
	:	VOIR DIRE QUESTIONS
Starwood Hotels & Resorts Worldwide, Inc.,	:	
	:	
Defendant.	:	
-----	X	

VOIR DIRE QUESTIONS

1. HAVE YOU EVER BEEN ON A JURY BEFORE?

YES NO

WAS IT: CIVIL? CRIMINAL?

IF YES, DID YOU REACH A VERDICT? YES NO

2. HAVE YOU OR HAS ANYONE CLOSE TO YOU EVER SUED OR BEEN SUED IN ANY TYPE OF LAWSUIT, EXPLAIN:

SUED BEEN SUED EXPLAIN:

3. HAVE YOU OR HAS ANYONE CLOSE TO YOU EVER SUED OR BEEN SUED IN AN EMPLOYMENT TYPE OF LAWSUIT, EXPLAIN:

4. ARE YOU OR IS ANYONE CLOSE TO YOU A MEMBER OF A UNION?

5. DO YOU BELIEVE THERE ARE UNIONS CAN PLACE TOO MANY RESTRICTIONS ON WHAT EMPLOYERS CAN AND CANNOT DO REGARDING THEIR EMPLOYEES?

YES NO IF YES, EXPLAIN:

6. DO YOU WORK IN AN ENVIRONMENT WHERE THERE IS A UNIONIZED WORKFORCE?

7. DO YOU THINK IS DIFFICULT TO DISCIPLINE EMPLOYEES IN A UNIONIZED WORKFORCE?

8. DO YOU THINK IS DIFFICULT TO TERMINATE EMPLOYEES IN A UNIONIZED WORKFORCE

9. HAVE YOU, OR HAS ANYONE CLOSE TO YOU, EVER BEEN ACCUSED OF OR BEEN A VICTIM OF DISCRIMINATION IN A JOB SITUATION?

10. HAVE YOU EVER BEEN TERMINATED FROM EMPLOYMENT, IF SO, WHY?

11. HAVE YOU, OR HAS ANYONE CLOSE TO YOU, EVER BEEN ACCUSED OF OR BEEN A VICTIM OF DISCRIMINATION IN A JOB SITUATION?

YES, I HAVE YES, SOMEONE CLOSE HAS

NO IF YES, EXPLAIN:

- 12. HAVE YOU OR SOMEONE CLOSE TO YOU EVER BEEN ACCUSED OF OR BEEN A VICTIM OF INAPPROPRIATE OR UNFAIR TREATMENT IN A JOB SITUATION?**

YES NO IF YES, EXPLAIN:

- 13. DO YOU THINK THAT HARASSMENT AND DISCRIMINATION IN THE WORKPLACE IS COMMON?**

- 14. HAVE YOU, OR HAS ANYONE CLOSE TO YOU, EVER BEEN DEMOTED, TERMINATED, OR LAID OFF FROM A JOB?**

YES, DEMOTED YES, TERMINATED

YES, LAID-OFF NO IF YES, EXPLAIN:

- 15. HAVE YOU EVER BEEN INVOLVED IN DISCIPLINING OR TERMINATING SOMEONE OR IMPLEMENTING A LAY OFF?**

YES NO IF YES, EXPLAIN:

- 16. HAVE YOU OR ANYONE CLOSE TO YOU EVER MISSED A SIGNIFICANT AMOUNT OF TIME FROM WORK FOR MEDICAL REASONS (EXCLUDING PREGNANCY)?**

YES NO IF YES, EXPLAIN:

- 17. HAVE YOU EVER FELT AS THOUGH YOUR WORKLOAD OR POSITION WAS AFFECTED BY A CO-WORKER BEING ON MEDICAL OR DISABILITY LEAVE OR RESTRICTIONS?**

YES NO IF YES, EXPLAIN:

- 18. GENERALLY, DO YOU THINK EMPLOYERS ALLOW THEIR EMPLOYEES REASONABLE TIME OFF FOR MEDICAL ISSUES?**

YES NO IF YES, EXPLAIN:

19. DO YOU OR PEOPLE YOU WORK WITH MAKES JOKES AT WORK?
- YES YES OR NO, EXPLAIN:
20. HAVE YOU EVER WORKED WITH A DIFFICULT CO-WORKER?
21. HAVE YOU EVER WORKED FOR A DIFFICULT SUPERVISOR OR MANAGER?
22. DO YOU BELIEVE THAT IT IS NECESSARY TO SPEAK ONE LANGUAGE IN THE WORKPLACE?
23. HAVE YOU EVER WORKED IN A KITCHEN OR A RESTAURANT?
24. HAVE YOU EVER STAYED AT THE WESTIN HOTEL IN NYC AT 43 STREET?
25. HAVE YOU EVER STAYED AT ANY WESTIN HOTEL IN NYC?
26. HAVE YOU EVER HAD A DISPUTE WITH STARWOOD OR ANY OF ITS BRANDS, WHICH INCLUDE THE SHERATON, THE WESTIN, ON HOTELS, ST. REGIS AND FOUR POINTS?
27. THIS CASE INVOLVES A DISPUTE BETWEEN AN EMPLOYER AND AN EMPLOYEE WITH A DISABILITY. IS THERE ANY REASON WHY YOU MIGHT NOT BE ABLE TO BE AN IMPARTIAL JUROR IN A CASE WITH THESE ISSUES?

YES NO

Dated: New York, New York
September 25, 2009

HOLLAND & KNIGHT LLP
*Attorneys for Defendant STARWOOD HOTELS
AND RESORTS WORLDWIDE, INC.*

By: 

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